



October 4, 2022

RE: WSEC-Residential – Option 1 of R406 Table Preferred and Opposition to Heat Pump Mandate

Dear Washington State Building Code Councilors,

I am writing today on behalf of JK Monarch Fine Homes to voice concerns over the Group 2 code package currently up for consideration. I strongly urge the SBCC to remove proposals 032, 058, 059, 060, 062, 063, 065, 066, 079, 080, 089, and 091 from the Group 2 building code package. Further, I would urge adoption of Option 1 of the R406 Table (073) that preserves the ability to choose natural gas for space and water heating.

We hear regularly from our homebuyers that they are disappointed we no longer offer on demand hot water and gas heat, due to the punitive scoring under the current energy code. Buyers cite concerns over the common power outages the region has in the winter months, the substantially higher costs they must pay for electricity, and the comfort of endless hot water.

Suppliers of all goods across the globe have chosen to simplify product offerings in order to be able to provide any reasonable volume of goods. Instead of 10 options pre-pandemic, you might get 2. Washington State while noble in its attempt at being a leader, will surely be a follower by forcing the use of products which are unobtainable in sufficient quantity, exacerbating the current housing crisis. Choice in product is more important now simply to be able to continue to build.

In its current form, the 2021 code package represents the most stringent code in the nation and will increase the up-front cost of a new home by a minimum of \$24,070, meaning a homeowner will pay \$72,210 for these unfunded mandates over the life of their mortgage. Adding to the cost of constructing new housing units will exacerbate our housing affordability crisis. In Pierce County, 86% of families already cannot afford to purchase a median priced home.

In addition to the updated building code, builders are fighting skyrocketing costs for building materials, supply chain challenges (such as with compliant heat pumps, reference emergency rule adopted by the SBCC in July of 2022: CR-103E), rising interest rates, and a shortage of qualified workers. At the same time, the HVAC industry specifically is facing changing refrigerant standards, moving from HFC refrigerants to A2L refrigerants. The change in refrigerant standards will reduce the supply of compliant heat pumps available to install in new homes.

I strongly urge the SBCC to remove proposals 032, 058, 059, 060, 062, 063, 065, 066, 079, 080, 089, and 091 from the Group 2 building code package before final passage. Washington builders and homeowners simply cannot afford these code updates.

Sincerely,



Corey Watson
General Manager